

Exhibit A

EEOC Received Date: 3/20/2025

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.	Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 440-2025-05026
Illinois Department of Human Rights and EEOC State or local Agency, if any	

Name (indicate Mr., Ms., Mrs., Mx.) Ms. Felisha Willis	Home Phone (Incl. Area Code) [REDACTED]	Date of Birth [REDACTED]
Street Address [REDACTED]	City, State and ZIP Code [REDACTED]	Email Address [REDACTED]
Street Address c/o Nathan C. Volheim, Sulaiman Law Group, 2500 S. Highland Ave., #200, Lombard, IL 60148 (employment@sulaimanlaw.com)	City, State and ZIP Code	Email Address

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)


Name The University of Chicago Medical Center	No. Employees, Members 15+	Phone No. (Include Area Code) (800) 824-0200
Street Address 5841 S MARYLAND AVE	City, State and ZIP Code CHICAGO, IL 60637-1443	Email Address mark.lubus@uchicagomedicine.org
Name	No. Employees, Members 15+	Phone No. (Include Area Code)
Street Address	City, State and ZIP Code	Email Address

DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify below.)	DATE(S) DISCRIMINATION TOOK PLACE Earliest 09/2024 Latest 02/27/2025 <input type="checkbox"/> CONTINUING ACTION
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THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I, Felisha Willis, was employed with the University of Chicago Medical Center through a staffing agency as an Anesthesia Technician from in or around September of 2024 until I was unlawfully terminated on or around February 27th, 2025 on the basis of my sex and in retaliation for my opposing sexual harassment during my tenure. Throughout my time with the University of Chicago Medical Center, I experienced sexual harassment as well as escalating retaliation for making a protected complaint regarding this harassment.

The following is a non-exhaustive list of the discrimination and harassment I suffered:

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTARY – When necessary for State and Local Agency Requirements
I declare under penalty of perjury that the above is true and correct.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT
03 / 18 / 2025 Date	SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)
 Charging Party Signature	

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THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

In or around September of 2024, just a week after I started my position, my manager, Don (LNU, Male), began calling me outside of work. He also made unsettling remarks about workplace dynamics, including warnings about who I should and shouldn't interact with and statements suggesting that the company would get rid of employees that they considered "a problem." Over the next several months, Don continued to make inappropriate and overbearing comments, while implying that he had influence over hiring and firing decisions due to his close relationship with his own supervisor, Taylor (LNU, female).

In or around October of 2024, Don asked me out on a date, which I initially feared rejecting due to potential retaliation. Before replying to Don, I discreetly sought out a new contract through my staffing agency. After successfully securing another contract, I turned Don down via text. Following my rejection, in or around November of 2024, I noticed that Don began following my Instagram account and regularly viewing my stories. His behavior became increasingly intrusive, and it felt as though he was using my social media presence as an avenue for monitoring my behavior. After this, I began trying to keep professional distance between Don and myself. It was quite clear that Don noticed my discomfort and resented my opposition to his advances.

In or around December of 2024, Don began assigning me disproportionately more work than my coworkers. He had never assigned me this amount of work compared to my peers before I refused his advances, and it was clear that this was in retaliation for my rejection. Fearing further escalation, I reported this retaliation to the HR Department of my staffing agency, who was able to raise the issue with my employer's HR manager on my behalf. The degree to which I feared Don's influence in the facility is very strongly supported by the fact that I felt the need to report to my staffing agency first, rather than directly raise my concerns with my employer. The following actions by my employer show that ultimately my fears were warranted.

On or around January 9th, 2025, I met with my employer's HR manager. I provided screenshots of my correspondence with Don, including my rejection of his advances. HR subsequently reached out to Don, who tried to downplay the interactions, claiming that his messages were not of a "romantic nature."

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I declare under penalty of perjury that the above is true and correct.

03 / 18 / 2025

Date



Charging Party Signature

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

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THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

While HR acknowledged that Don's communications were inappropriate and unprofessional, no concrete action was taken on their part to address the matter. Don faced no disclosed disciplinary action and remained in his supervisory role over me. In addition to this, HR questioned—in a rather accusatory manner—why I had not raised my concerns sooner. I then informed them of my fear of retaliation from Taylor. No concrete action was taken to address this either, as Taylor continued to be in a supervisory role over me. I was merely told on or around January 28th that they had "spoken" with both Don and Taylor. Ultimately, HR's inaction signaled to both Don and Taylor that there would be no serious consequences for their actions.

On or around February 27th, 2025, I was suddenly called into Taylor's office. She mentioned that she was alerted of a post on my social media that I had made about having a slow day at work. She then said that there were complaints about my work performance, though I had never received any complaints or criticisms regarding my performance before this meeting. I then provided explanations for the post. While something like this would ordinarily result in a write-up or a conversation, Taylor instead opted to immediately terminate me. I pointed out the fact that other employees who had committed even worse infractions—namely verbally assaulting coworkers—had been given write-ups despite being repeat offenders, but Taylor denied any resemblance between their cases and my own. I then asked Taylor if she was treating me differently because I made a complaint about sexual harassment, which she also denied. Nevertheless, it is quite clear from the distinctly harsh punishment I received for this infraction that I was being retaliated against. After making a protected complaint to HR opposing sexual harassment, my employer refused to take the necessary and proper actions to protect me. That is to say, they chose to ignore my valid concerns regarding retaliation from members of management that were close to my harasser. Because of their inaction, I was subjected to almost immediate and severe retaliation due to my opposition to sexual harassment, ultimately culminating in my unlawful termination.

Thus, I have been discriminated against on the basis of my sex (female), but I also was subjected to sexual harassment and retaliated against in violation of Title VII of the Civil Rights Act of 1964, as amended and (775ILCS 5/) Illinois Human Rights Act.

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